

September 2, 2021

**BY ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket 5022 - Suspension of Service Terminations and Certain Collections Activities During the COVID-19 Emergency – Terminations Responses to PUC Data Requests – Set 6**

Dear Ms. Massaro:

On behalf of National Grid,<sup>1</sup> I have enclosed the Company's responses to the PUC's Sixth Set of Data Requests in the above-referenced matter.<sup>2</sup>

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Sincerely,



Raquel J. Webster

Enclosure

cc: Docket 5022 Service List  
Jon Hagopian, Esq.  
John Bell, Division  
Linda George, Division

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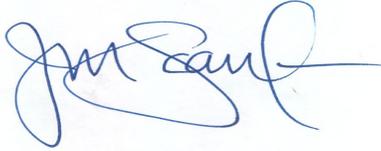
<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

<sup>2</sup> Per Commission counsel's update on October 2, 2020, concerning the COVID-19 emergency period, the Company is submitting an electronic version of this filing. The Company will provide the Commission Clerk with a hard copy and, if needed, additional hard copies of the enclosures upon request.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



\_\_\_\_\_  
Joanne M. Scanlon

September 2, 2021

Date

**Docket No. 5022 – COVID-19 Emergency Order**  
**Service List as of 4/1/2021**

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The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 5022  
COVID-19 Emergency  
In Re: Quantification of Waived Fees, August Update 2021  
Responses to Commission's Sixth Set of Data Requests  
Issued on August 12, 2021

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PUC 6-1

Request:

Does National Grid believe that the inability to charge late/interest fees is a hinderance to collections of outstanding balances. Please explain in detail.

Response:

National Grid believes that the re-establishment of late payment charges is a critical part of returning to business as usual in the post-Pandemic environment. Notwithstanding the loss of approved tariff revenue, these charges serve to affect customer behavior. This is partially evidenced by the tremendous growth in arrears since the suspension of late fees at the end of March 2020.

For example, the 180+ day arrears have increased to approximately \$49 million at the end July 2021 versus March 2020 for the combined electric and gas businesses. Although the threat of termination creates the most powerful incentive for customers to pay their bills, the late payment charge serves to condition behavior. Customers typically seek to avoid an additional fee. The mindset that the late payment fee creates is one of avoiding a penalty if a bill is paid by a certain date and the customer avoids the fee.

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PUC 6-2

Request:

If the prohibition on charging late/interest fees is lifted, what measures and means of communications would [Name of Utility] utilize to inform customers that they will again be subject to these fees on overdue balances? What does [Name of Utility] believe is a reasonable notice period prior to the lifting of the prohibition to properly educate customers?

Response:

If the prohibition on charging late/interest fees is lifted, National Grid would utilize appropriate, available, Company-owned communication channels and its COVID-related web pages to communicate to customers that they may once again be subject to late fees on overdue balances.

National Grid believes that 30 calendar days, or one month prior to the lifting of the prohibition on late fees on overdue balances is a reasonable notice period to educate customers.

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PUC 6-3

Request:

Has National Grid determined if the waiver of credit card/debit card/online check fees has resulted in better collections activities from any class of customers? If so, please explain/provide data. If not, please explain. If the utility already absorbs these fees, please advise.

Response:

National Grid has seen an increase in the number of debit/credit card payments from residential, commercial and low-income customers since credit/debit card fees have been waived. This increase in the number of debit/credit card payments has also resulted in an increase in overall dollar amounts collected. There was a 20% increase in credit/debit card payments during the period February 2021 through July 2021 compared to the prior February 2020 through July 2020 period. There was an 18% increase in cash for credit/debit card payments during the period February 2021 through July 2021 compared to the prior February 2020 through July 2020 period. Please see Attachment PUC 6-3.

National Grid has also seen an increase in other electronic forms of payments, which reflect that customers did not switch from what was before a free method of payment, such as Web or IVR (electronic check), to payment using a credit/debit card due to the abeyance of the fee. During the second quarter of 2021, National Grid saw an increase in the electronic check (ACH) percentage to 64.5% (not including credit/debit cards), slightly greater than that of the second quarter of 2021 of 62.7%.

### Rhode Island 2020 - 2021 Debit Card and Credit Card Payments

Years	Count of Account Type	Account Type	Low Income Flag	Low Income	Grand Total
2020	Month	COMMERCIAL	RESIDENTIAL	Low Income	Grand Total
Feb	1,191	32,271	6,006	39,468	
Mar	951	30,397	5,332	36,680	
Apr	686	29,911	6,040	36,637	
May	740	29,189	5,858	35,787	
Jun	839	29,097	5,910	35,846	
Jul	855	30,145	6,170	37,170	
Aug	1,043	30,057	5,415	36,515	
Sep	1,197	31,360	5,847	38,404	
Oct	1,256	33,911	5,704	40,871	
Nov	1,146	32,430	5,097	38,673	
Dec	1,434	33,623	5,495	40,552	
<b>2020 Total</b>	<b>11,338</b>	<b>342,391</b>	<b>62,874</b>	<b>416,603</b>	
2021	Jan	1,366	37,698	6,257	45,321
Feb	1,405	33,915	5,392	40,712	
Mar	1,634	41,682	6,822	50,138	
Apr	1,470	36,022	5,857	43,349	
May	1,560	37,331	5,729	44,640	
Jun	1,538	41,854	6,905	50,297	
Jul	1,446	40,358	6,810	48,614	
<b>2021 Total</b>	<b>10,439</b>	<b>268,860</b>	<b>43,772</b>	<b>323,071</b>	
<b>Grand Total</b>	<b>21,777</b>	<b>611,251</b>	<b>106,646</b>	<b>739,674</b>	

Rhode Island 2020 - 2021 Debit Card and Credit Card Payments



### Rhode Island 2020 - 2021 Debit Card and Credit Card Payments \$\$

Years	Total Amount Sum	Account Type		Low Income Flag		Grand Total
		COMMERCIAL	RESIDENTIAL	RESIDENTIAL	Low Income	
2020						
	Months					
	Feb	\$562,614.28	\$6,068,627.06	\$1,032,843.00	\$7,664,084.34	
	Mar	\$419,679.25	\$5,476,228.38	\$860,034.42	\$6,755,942.05	
	Apr	\$242,555.30	\$5,047,548.14	\$949,754.26	\$6,239,857.70	
	May	\$278,987.15	\$4,851,811.45	\$933,545.15	\$6,064,223.75	
	Jun	\$287,722.94	\$4,390,868.65	\$840,518.91	\$5,519,110.50	
	Jul	\$289,048.14	\$4,357,700.75	\$833,033.53	\$5,479,782.42	
	Aug	\$355,570.93	\$4,726,273.09	\$759,528.53	\$5,841,372.55	
	Sep	\$467,891.56	\$4,898,058.56	\$814,597.34	\$6,180,547.46	
	Oct	\$426,191.35	\$4,727,774.45	\$707,688.84	\$5,861,654.64	
	Nov	\$353,932.80	\$4,237,758.89	\$620,252.33	\$5,211,944.02	
	Dec	\$462,013.11	\$4,721,222.53	\$668,104.31	\$5,851,339.95	
<b>2020 Total</b>		<b>\$4,146,086.81</b>	<b>\$53,903,871.95</b>	<b>\$9,019,900.62</b>	<b>\$66,069,859.38</b>	
2021						
	Jan	\$512,097.62	\$6,479,599.68	\$960,329.03	\$7,952,026.33	
	Feb	\$528,402.35	\$6,115,899.30	\$856,456.11	\$7,500,757.76	
	Mar	\$594,784.90	\$8,052,907.76	\$1,222,344.06	\$9,870,036.72	
	Apr	\$520,162.95	\$6,075,971.62	\$910,067.00	\$7,506,201.57	
	May	\$502,960.86	\$5,395,360.91	\$800,037.72	\$6,698,359.49	
	Jun	\$445,149.89	\$5,938,243.67	\$963,112.38	\$7,346,505.94	
	Jul	\$424,554.65	\$5,759,477.54	\$930,691.51	\$7,114,723.70	
<b>2021 Total</b>		<b>\$3,528,113.22</b>	<b>\$43,817,460.48</b>	<b>\$6,643,037.81</b>	<b>\$53,988,611.51</b>	
<b>Grand Total</b>		<b>\$7,674,200.03</b>	<b>\$97,721,332.43</b>	<b>\$15,662,938.43</b>	<b>\$120,658,470.89</b>	

### Rhode Island 2020 - 2021 Debit Card and Credit Card Payments \$\$



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PUC 6-4

Request:

If the Commission were to lift the prohibition on assessing credit card fees, what is National Grid's intent on whether to reinstitute the fee? If the utility already absorbs the fees, this can be N/A.

Response:

If the Commission were to lift the prohibition on assessing credit card fees, then National Grid would notify its third-party debit/credit card processing vendor and request that it reinstate the fee that it would assess customers using the service provided by the vendor.